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October 30, 2018

By Electronic Filing

Hon. Cathy L. Waldor
United States Magistrate Judge
Martin Luther King Jr. Courthouse
50 Walnut St.
Room 4040, Courtroom 4C
Newark, NJ 07101

Re: *Castillo v. Spectra East, Inc.*, No. 17-cv-07156

Dear Judge Waldor:

We write on behalf of the parties to seek a 45 day extension of fact discovery to take depositions only. Fact discovery is currently scheduled to close on October 31, 2018. The only remaining discovery is depositions, and Plaintiff's deposition is scheduled for November 16th. The parties are confident that they can schedule and complete all depositions by the middle of December. Accordingly, the parties respectfully request an order (a) extending fact discovery to take depositions only from October 31 to December 14, 2018, and (b) rescheduling the in person Status Conference from November 14, 2018 to a date after Plaintiff's deposition.

Respectfully submitted,

/s/ David Baron

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cc: Robert A. Tandy, counsel to Plaintiff (via ECF)

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